

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SHIRLEY DOUGLAS**

**CHAPTER 13 PROCEEDING**

**CASE NO. 09-13893**

**TERRE M. VARDAMAN, TRUSTEE FOR  
THE ESTATE OF SHIRLEY ANN DOUGLAS**

**PLAINTIFF**

**VS.**

**ADVERSARY NO. 10-01187-DWH**

**RICHARD B. SCHWARTZ, SCHWARTZ &  
ASSOCIATES, P.A., and VANN F. LEONARD  
AND JOHN DOES**

**DEFENDANTS**

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**DEBTOR SHIRLEY DOUGLAS' RESPONSE TO MOTION TO STAY**

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Debtor, Shirley Douglas, responds to Defendants' Motion to Stay as follows:

1. Debtor agrees that her action filed in Hinds County Mississippi was the first filed and that, therefore, this action should be stayed.
  
2. Debtor notes that the staying of this action should not prevent this Court from granting Debtor's pending Motion to Require Schwartz to pay \$172,414.68 to the Trustee or into the Registry of the Court. Debtor filed that motion in her bankruptcy proceeding and the motion involves issues properly before this Court.

This the 22<sup>nd</sup> day of December, 2010.

Respectfully Submitted,

SHIRLEY DOUGLAS

By Her Attorney,

/s/ Philip W. Thomas  
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### CERTIFICATE OF SERVICE

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I certify that I electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to counsel who have electronically registered the non-ECF participants.

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This the 22<sup>nd</sup> of December, 2010.

/s/ Philip W. Thomas  
PHILIP W. THOMAS